

Hamid Michael Hejazi  
Inmate ID # 3925882  
Lane County Adult Corrections  
101 West 5th Avenue  
Eugene, OR 97401-2695

FILED 3 AUG '21 1033USDC-ORP

In The United States District Court for The District of Oregon  
Eugene Division

Hamid Michael Hejazi,  
Plaintiff,  
v.

Kamala Shugar,  
Debra Vogt,  
Lane County Circuit Court,  
Lane County, and  
State of Oregon,  
Defendants.

Case No. 6:21-cv-01142-MO

Complaint for the  
Torts of: Civil  
Rights Violation,  
Obstruction of  
Justice, Obstruction  
of Right to Counsel,  
Due Process Violation,  
Obstruction of  
Right to Legal Process  
and to Present Legal  
Defenses, to be  
Heard, Breach of  
Privacy, Violation of  
Security of Person  
and Things (Records),  
Health Information  
Privacy Violation,  
Search Without a  
Warrant, Illegal  
Arrest, Illegal  
Transport, Illegal  
Confinement, Illegal

Commitment to a  
Mental Hospital,  
Harrassment, Official  
Misconduct, Persecution,  
Conspiracy, Abuse,  
Fraud, Intentional  
Infliction of Emotional  
Distress, Outrageous  
Government Conduct,  
Outrageous Indifference,  
Medical Coercion,  
War Crime, Torture,  
Negligence, Libel,  
Slander, and the  
Suppression of Justice,  
Including Judicial  
Misconduct

Prayer/Demanded  
Amount:

1 Billion Dollars

\$1,000,000,000.00

Seeking Declarative  
Relief and Specific  
Performance

No Jury Trial Demanded

I. Parties

Plaintiff - Hamid Michael Hejazi  
Inmate ID# 3925882  
Lane County Adult Corrections  
101 West 5<sup>th</sup> Avenue  
Eugene, OR 97401-2695

Defendant 1- Kamala Shugar  
Circuit Court Judge  
Lane County Circuit Court  
125 East 8<sup>th</sup> Avenue  
Eugene, OR 97401

Defendant 2- Debra Vogt  
Circuit Court Judge  
Lane County Circuit Court  
125 East 8<sup>th</sup> Avenue  
Eugene, OR 97401

Defendant 3- Lane County Circuit Court  
125 East 8<sup>th</sup> Avenue  
Eugene, OR 97401

Defendant 4- Lane County  
125 East 8<sup>th</sup> Avenue

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Eugene, OR 97401

Defendant 5 - State of Oregon

Oregon Department of Administrative Services

155 Cottage Street N.E. #U90

Salem, OR 97301

c/o Attorney General of Oregon

1162 Court Street N.E.

Salem, OR 97301-4096

## II. Authorities

Plaintiff relies upon all constitutional, statutory, regulatory, and common-law legal frameworks establishing liability for the facts of civil rights violation, obstruction of justice, obstruction of right to counsel, due process violation, obstruction of right to legal process and to present legal defenses, to be heard, breach of privacy, violation of security of person and things (records), health information privacy violation, search without a warrant, illegal arrest, illegal transport, illegal confinement, illegal commitment to a mental hospital, harassment, official misconduct, persecution, conspiracy, abuse, fraud, intentional infliction of emotional distress, outrageous government conduct, outrageous indifference, medical coercion, war crime, torture, negligence, libel,

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slander, the suppression of justice, judicial misconduct, including 42 U.S.C. § 1983, 42 U.S.C. § 2000aa, 42 U.S.C. § 10806, and 42 U.S.C. § 1985, along with the constitutional rights to counsel in criminal proceedings and prosecutions, right to be heard, to present a legal defense, right to freedom from search without a warrant or probable cause, as well as all other relevant and prevailing legal doctrines and standards – alongside the state equivalents, with pertinent regulations set forth and at issue; such as 'Forensic Mental Health Evaluators and Evaluations' 309-090-0000.

### III. Claims

By history, from between June or July 2016, and leading up to this period, from Plaintiff's earliest interactions with the Defendant, Lane County's, health authority, Plaintiff began to suspect that the professional ethics and good government accountability of the semi-privatized Trillium Oregon Health Plan managed care administration, working alongside the local health authority, specifically in the area of behavioral (mental) health, was seriously compromised – causing agency contractors thereof to seriously abuse, exploit, neglect, profiteer, and corrupt the individualized care plans and services rendered to the general



public and service recipient patients and clients - as it would turn out, with grave results, injuries, profound cover-ups, and generally a fated breakdown in the very relationship between those working for the system, within the expectation of dishonesty and looking the other way from questionable conduct, and those whom lived within the affected region, and the nature of service and support that they had come to expect (or realize was due); all such that by process of osmosis, the entire local government, the courts and law enforcement included, have come to be shaped around a hostile ethos - one that runs directly against the principle that posse commitatus (home rule) places upon the local government the ultimate mandate of the care of the people.

The important facts supporting these contentions can be realized upon an analysis of the transition, from the 1970's until the mid 1990's, of the large and prominent entity 'White Bird Clinic', from a counter-culture health agency servicing the drug cartel, the Oregon Country Fair (non-profit shell organization), to one that is embedded into the local police - an entity that provides transport to medical appointments, and front line street crisis work, but which is entirely unregulated and is known for abuses of vulnerable persons. Other important facts may be realized by an examination of the cover up engaged in by the Lane County

health authority, alongside County counsel Stephen Dingle, once the Oregon Governor's office initiated an audit on Plaintiff's whistleblowing on-point.

Between September 2016 and following November 2017 it became entirely obvious to Plaintiff, that their concerns of suspected large scale abuses, exploitation, and criminal cover up by the local government, were entirely valid - and that from the lowest levels of County administrators, through to the office of County supervisor, specifically by the conduct of Supervisor Pat Farr - in so far as Supervisor Farr strove to hide the 2016 negative official mental health system audit findings, officials were in some manner going along with obvious systemic abuses, than attempting to correct these - as public ethics and the laws of public official comportment dictate. Moreover, since losing their last professional employment for whistleblowing, Plaintiff had, by virtue of their public office seat on the county 'Mental Health and Addictions Advisory Committee', commenced another mini-audit, to highlight how their former employer, Columbia Care Services, Inc., in running the Houglass Community Crisis Center, as a contractor of Lane County, going so far as to commit the crime of widescale abandonment



of severely disabled adults and seniors—right up to the point of causing death or serious injury, fraudulently misleading the public, exploiting their status to privateer, and running against statewide public health law, etc. The mini-audit discovered ColumbiaCare's frauds, and the matter was referred to the county for corrective action; however, the advisory body's undemocratic invested issue referral structure, of having the Standing Committee overhead, quashed the item. Also, in the meantime Plaintiff had learned that County contractor Rise Service, Inc. was also working with the local government to hide the actual abuse of disabled children—and, again, as evidence of the total depravity Lane County's health authority, Plaintiff learned that the county health officer, in betrayal of their medical licensure, in betrayal of the public trust placed in them, and against all good ethics, coldly and wickedly, refused to receive, review, or forward on any such report of abuse going on under their purview—ultimately that civil society in Lane County had fallen into turmoil and anarchy—and all this is extensively documented.

Then, in May 2018, while the local government worked with Plaintiff's landlord to illegally evict Plaintiff onto the streets, refusing Plaintiff all legal recourse and remedies statutorily available, and following a remarkably ridiculous attempt made by Lane County and the



local police, just before Plaintiff's eviction, to have him committed to the mental hospital, as a danger to self or others, an attempt which failed, being based entirely upon pretense and fabricated claims, the local police put together a case, alongside the state, to say that Plaintiff was a potential 'cop killer' and an 'Arab Enemy Combatant'. The case was handled in a plea deal, for a count of contempt that had nothing to do with the outrageous attempt made by the local police and government to frame Plaintiff, and quote, to frighten him into leaving the country.

Later the police admitted to the fraudulent motive and nature of that case - and the issue is in post-conviction relief, relief for fraud upon the court, and in civil litigation. However, to keep the story and claims alive, to avoid profound embarrassment, to continue to try and get rid of Plaintiff, and to hide the profound abuses by the local health authority, including the murder of Jack Nariss Issit, about whom Plaintiff blew the whistle, whom the local government killed to hide his exploitation for his veteran's benefits and property, etc, all for the reason that having called Plaintiff a cop killing terrorist in fraud is impossible to come back from, the local government has

fabricated a series of criminal charges against Plaintiff - again, with the motive of having Plaintiff deported, imprisoned, or killed - for the cost of actually dealing with the crimes of the local government now is so vast and extensive, that the government cannot even seem to fail; and it is at this point that the conduct of Defendants in this case come into play - setting the basis for tortious liability, and declarative relief.

Between March and May 2021, in Plaintiff's state criminal charges, still pending in pretrial proceedings, it became clear to Plaintiff that their court appointed counsel, Martin Thompson Jr., was ineffective for various reasons which Plaintiff put before the court, the Defendants, the state of Oregon, Lane County, the Lane County Circuit Court, and judges Shugar, and, by extension, being the presiding judge over the criminal docket, Vogt. However, rather than hear the motion and inquire as to the cause for removal of Thompson from Plaintiff's case, or simply to replace Thompson without inquiry, or otherwise remedy the issues of ineffectiveness, Judge Shugar, on June 7, 2021 ordered that Plaintiff be transported and committed to the Oregon State Hospital (O.S.H.), the state's psychiatric hospital, for the purpose of and to undergo a 'fitness to proceed' examination, doing so on behalf of the state of Oregon, Lane County, and Lane County



Circuit Court.

While Plaintiff is still awaiting said transport, commitment, and examination, they are endeavoring to stop the process - having filed for an Oregon Supreme Court original jurisdiction writ mandamus, with a stay, pending the issuance of said writ; having done so in the day or two following the issuance of the order at issue. Moreover, Plaintiff filed a demand to reverse the order with Judges Shugar and Vogt, citing several of the same causes of action cited in this suit - a demand that's been ignored for over two weeks.

Thus now we come to the causes for relief - noting that this suit raises far reaching public welfare issues, including private causes that arise therefrom. In the most general sense the order at issue violates international obligations which the United States, and her member states, owe to the whole human community, between all the nations - for by Judge Shugar ignoring the fraudulent implication of Plaintiff being an enemy combatant, a terrorist, persisting upon the wrongful case as though it were true, and then using the medical, psychiatric commitment and evaluation process to undermine Plaintiff's right to challenge the effectiveness of their court appointed counsel, both on due process and right to counsel

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grounds, violates international conventions and doctrines arising from case law, against torture, against war crimes, established to protect both civilians and combatants in times of war and peace, including Geneva, Hague, Vienna, and Neuremburg (spelling uncertain) legal frameworks - for in reality Plaintiff had put forth the wrongs that they faced as part of the original being framed as a terrorist as a due process outrageous government affirmative defense in their state criminal prosecution - using it again as to justify why, for being unwilling to investigate the issue, Plaintiff's counsel was ineffective, for suspending their professional judgement, and Judge Shugar explicitly cites the terrorist case to justify sending Plaintiff to the D.S.H. Notably, Plaintiff is a foreign national, an alien, though not a terrorist - and so even though Judge Shugar sought to conceal Plaintiff's concerns about the state's original fraud within a referral for commitment, she also thus conspires in the original fraud, seeks to and does hinder Plaintiff's lawful right to seek remedies from said frauds, and showing her utmost demented demagoguery and willingness to do harm against justice (sealing her soul eternally into the chains saved for the most unshackled traitors to decency), she presents the psychiatric evaluators with no question as to the truth of the matter of the offenses claimed in the original terrorist case -

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in an endeavor to override and bar Plaintiff's right to have raised the issue of their counsel's ineffectiveness—for refusing to investigate the fact of the outrageous government conduct in the first place. Thus Judge Shugar commits both fraud as well as medical coercion, which amounts to torture (knowing that fitness evaluators are not factfinders).

Judge Shugar's order then goes on to demand that all medical and evidence of mental illness records about Plaintiff be disclosed to the O.S.H. by all local government bodies and agencies<sup>\*</sup>—to be used in said examination, proving, as it were, that Judge Shugar doesn't really have a reason to doubt Plaintiff's fitness to proceed—and is merely calling on government, and their contractors, many of whom are in a direct conflict of interest with Plaintiff (all well known to Judge Shugar—provided that she's been advised by Plaintiff and in her reading of the terrorist claim case) to make up a case for a finding that Plaintiff is unfit—so to excuse the court from evaluating Plaintiff's contentions that their defenses before their Counsel ought to be investigated—or that their counsel is ineffective. By so doing Judge Shugar is violating Plaintiff's health privacy, searching Plaintiff without a warrant or probable cause, nor just reason, and breaching

<sup>\*</sup>'whatever that means' - continued -

Plaintiff security of their things and person, etc.

Defendants, in concert, are liable for they have been made aware of these violations, in particular the breaches of privacy, right to counsel, medical coercion, commitment without cause, fraud, and civil rights violations—though they refuse to remedy the problems—and so are guilty of a conspiracy; well established by the prior and ongoing targetting of Plaintiff, and the crime syndicate that they are endeavoring to protect by suppressing Plaintiff in his claims and concerns. As a totality of circumstances the defendants are guilty and liable for acting in excess of their authority, with undue riggor, in deprivation of Plaintiff's rights, in an ongoing customary action with impunity (as discussed above—as an extension of the corruption of the local government, against their public duties), in an outrageous government conduct, with outrageous indifference, an intentional infliction of emotional distress, in an abuse, in libel, slander, in negligence of the risks of harms likely to happen, in suppression of justice, as part of judicial misconduct, in overt persecution of Plaintiff, all by reacting to Plaintiff's attempt to legally rectify their representation and present their valid legal defenses, in court, such that the commitment, transport, and evaluation, along with any involuntary treatment (all of the order being opposed by Plaintiff), become a violation of civil rights,\* an

\*Carried out institutionally' - continued -



obstruction of justice, an obstruction of right to counsel, a due process violation, an obstruction of a right to legal processes, an obstruction of the right to present legal defenses, to be heard, and is a major rights violation of a foreign nation - to be free from being framed and abused as a supposed terrorist - wherefore, Judges Shugar and Vogt know that Plaintiff is fully fit to proceed, with ample evidence of that fact before them, knowing that their own court is guilty of multiple crimes against Plaintiff and the people (all extensively documented - up to including murder in cold blood); such that Defendants are attempting to allude justice - in so comporting themselves.\*

By their actions, errors, omissions, and torts Defendants have caused, and continue to cause, Plaintiff injuries, damages, lost opportunities, mental suffering, loss of dignity, loss of freedom, and gravely jeopardize Plaintiff's rights, security, health, and future harms.

Defendants, notably are setting up Plaintiff, to avoid their own liabilities for many crimes. Notice how in Judge Shugar's order - she mandates that Plaintiff's fitness be determined with or without Plaintiff's willingness to be evaluated. As such Judge Shugar is setting

up a situation where she can force Plaintiff to go pro se in his state case, or be committed, without the truth of the matter - for as we know, only those records that make Plaintiff seem unwell, mentally ill, are to be rendered to D.S.H. - violating health privacy; revealing again, that the order must be read in the full context of how it has arisen.

The facts at issue must also not the defense of Plaintiff - that their alleged crimes have come by way of the local governments both framing his criminal conduct (multiple times since whistleblowing), as well as by the local police and government setting up the circumstances such that the alleged misconduct by Plaintiff took place - and as it was admitted by the arresting police officer, all this, has been to get Plaintiff to leave the country; again, so that the local government can hide the multiple crimes that Plaintiff continues to report.\*

Let it be made perfectly clear: Judge Shugar and Defendants have no real cause to doubt Plaintiff's fitness to proceed. Note that in May 2019 the local district attorney also attempted to Plaintiff committed as unfit - and their cause was Plaintiff's hereditary title of royalty. It is a common tactic of criminal court actors, lawyers and judges, to use psychiatric commitment to 'deal with' cases that embarrass the Court - with multiple such cases being well documented.

\*'thus an institutional tort' - Continued -



meanwhile, Plaintiff's jail warehouses<sup>actually</sup> disturbed individuals for months at a time (well documented - a crime ignored by the local government) - such that the practice in Lane County, by Defendants\*, is to misuse and abuse mental health laws, and the state psychiatric system, for political repression purposes (which is effectively using Nazi war-crime tactics upon the public) - which is a profound crime against the people, a crime worthy of absolute outrage and resistance; it is a human rights crime, a war crime (as with Plaintiff), and a crime against humanity - absolutely justifying and vindicating Plaintiff's cries for Jack Noriss Isitt and the public.

'The greatest shame and dishonor upon those guilty of using medicine to do harm.'

Full compensation, declaratory, and injunctive relief, including punitive damages are thus justified.

#### IV. Timeliness and Exhaustion of Administrative Remedies

Plaintiff is commencing this action by mailed complaint today, July 28, 2021, within two months of the causes. Plaintiff sent Defendants a letter demanding that they cease their errors on or around June 13, 2021 -

which was ignored. Likewise Plaintiff sent Defendant a letter of concern sent to the O.S.H. on June 7, 2021; which was also ignored.

## VI. Relief

Plaintiff asks that this court grant them \$1 billion dollars in damages, \$1,000,000,000.<sup>00</sup>, declaratory relief, injunctive relief (to be filed for by a motion at a later date), punitive relief, and all other remedies deemed just and proper; with specific corrective performances as needed.\*

Signed under penalty of perjury that the foregoing is true and correct.

Respectfully Submitted,

Dated, July 28, 2021



Hamid Michael Hejazi

\* Let's also note that Judge Shugar's order is racist, in the negative history and tradition of 'Confederate' KuKluxKlan harboring Lane County - in so far has her order recapitulates the local government and Defendant's racist 'Arab Enemy Combatant' contentions (even though fabricated to hide their crimes and abuses). Shame upon those who spread hate against Arabs, our beloved cousins.